

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

**KRISTINA RAPUANO, VASSIKI
CHAUHAN, SASHA BRIETZKE,
ANNEMARIE BROWN, ANDREA
COURTNEY, MARISSA EVANS, JANE
DOE, JANE DOE 2, and JANE DOE 3,**

*Plaintiffs, on behalf of themselves and
all others similarly situated,*

v.

TRUSTEES OF DARTMOUTH COLLEGE,

Defendant.

CASE NO. 1:18-cv-01070 (LM)

Expedited Treatment Requested

**PARTIES' JOINT REPORT FOLLOWING MEDIATION, AND JOINT MOTION TO
EXTEND STAY TO ALLOW SUBMISSION OF SETTLEMENT DOCUMENTS**

The parties now come before the Court in order to jointly report to the Court regarding the results of the mediation in this case, and to request that the Court enter a further stay, to allow the submission of a Stipulation and Agreement of Settlement and related motion papers seeking the Court's approval of the resolution that the parties have negotiated. In support of this motion, undersigned counsel for Plaintiffs and Defendant state as follows:

1. On May 28, 2019, in response to a joint motion, the Court stayed all deadlines in this matter while the parties pursued mediation. On July 29, 2019, the Court granted the parties' motion to extend that stay through Monday, August 5.
2. The parties began mediating with the assistance of the Honorable Robert Morrill (ret.) on Wednesday, July 24. The mediation continued in person through Thursday, July 25 and Friday, July 26, and continued remotely in the days that followed.
3. The parties have now reached a settlement agreement-in-principle, subject to the approval of the Court. The agreement contemplates that Plaintiffs will seek certification of a

settlement class, after which, if approved, notice and related proceedings would follow.

4. In order to allow the parties to focus their efforts on preparing a Stipulation and Agreement of Settlement and the various other submissions to the Court, and not divert their attention at the same time to adversarial filings in the litigation, the parties respectfully request that the Court continue the stay currently in place with respect to all deadlines in the litigation.

5. The parties further request that the court allow them until Tuesday, August 20, 2019, to file with the Court (i) a signed Stipulation and Agreement of Settlement, which will be subject to the Court's approval; and (ii) a proposed schedule for this matter going forward, to include proposed deadlines for the submission of motion papers seeking certification of a settlement class, preliminary approval, final approval, and related matters.

WHEREFORE, the parties respectfully request that the Court continue the stay currently in place, and allow them until August 20, 2019 to file with the Court a signed Stipulation and Agreement of Settlement and proposed schedule for this matter going forward.

Respectfully Submitted,

Dated: August 6, 2019

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